

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Stephen C. Hudson, Sr.,

Court File No. 15-cv-420 (PJS/TNL)

Plaintiff,

VS.

**AFFIDAVIT OF  
JANA O'LEARY SULLIVAN**

City of Brooklyn Park  
Brooklyn Park Police Department,

Defendant.

STATE OF MINNESOTA )  
 )ss.  
COUNTY OF RAMSEY )

Jana O'Leary Sullivan, being first duly sworn on oath, deposes and states:

1. I am the attorney representing Defendant in the above-entitled matter.
2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiff's email to Jana Sullivan, 9/16/15.
3. Attached hereto as Exhibit 2 is a true and correct copy of Jana Sullivan's email to Plaintiff, 9/17/15.
4. Attached hereto as Exhibit 3 is a true and correct copy of Jana Sullivan's email to the Court, 9/17/15.
5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiff's email to Jana Sullivan and the Court, 9/18/15.
6. Attached hereto as Exhibit 5 is a true and correct copy of Email from Magistrate Leung to the parties, 9/23/15.
7. Attached hereto as Exhibit 6 is a true and correct copy of Letter and draft Complaint from Plaintiff to City/League of Minnesota Cities, 9/29/15.

8. Attached hereto as Exhibit 7 is a true and correct copy of Jana Sullivan email to Plaintiff, 9/29/15.
9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiff's email to City/League of Minnesota Cities, 9/30/15.
10. Attached hereto as Exhibit 9 is a true and correct copy of Jana Sullivan email to Plaintiff, 9/30/15.
11. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiff email to Jana Sullivan and City, 9/30/15.
12. Attached hereto as Exhibit 11 is a true and correct copy of Plaintiff's letter, 10/2/15.
13. Plaintiff Stephen Hudson has repeatedly violated the Court's orders, including the Court's order not to directly contact Defendant City and the Court's order denying Plaintiff's motion(s) to amend. Plaintiff's actions/violations have been burdensome and vexatious to the City, the League of Minnesota Cities, the League's general counsel Tom Grundhoefer, and me.
14. Most recently, the City has incurred \$1,200 in attorney fees preparing this motion and responding to Plaintiff's actions that have violated the Court's orders – and I anticipate the City will incur an additional \$150 for me to argue this motion, for a total of \$1,350 in attorney fees. Specifically, I charge an hourly rate of \$150 per hour; I spent 1.75 hours communicating with Plaintiff (specifically, telling him to cease and desist directly contacting the City) and communicating with my client about Plaintiff's improper communications. I spent 6.25 hours preparing this motion, including conducting legal research and drafting the motion.

s/ Jana O'Leary Sullivan  
Jana O'Leary Sullivan

Subscribed and sworn to before me  
this 14<sup>th</sup> day of October, 2015.

s/ Susan H. Chilcott  
Notary Public, State of Minnesota  
My Commission Expires 1/31/2020  
[SEAL]